



"Halchak, Brian"
<bhalchak@state.pa.us>
08/04/2009 08:36 AM

To Gerallyn Duke/R3/USEPA/US
cc 'MIKE MARA' <MMARA@gasmark.com>
bcc
Subject RE: Comments on Proposed Plan Approval for UGI
Development Company

Gerallyn,

I have returned from military service and have attached UGI response to your comments on the draft plan approval and review memo.

Please review and let me know if you have any additional questions. All comment periods have passed and I would like to issue this plan approval this week pending any additional comments you may have.

Thanks

Brian

-----Original Message-----

From: Duke.Gerallyn@epamail.epa.gov [mailto:Duke.Gerallyn@epamail.epa.gov]
Sent: Monday, July 13, 2009 3:52 PM
To: Halchak, Brian
Subject: Comments on Proposed Plan Approval for UGI Development Company

Hello Brian. Below are my comments on Proposed Plan Approval 40-328-006.

1. Is Unit 4 part of the facility for title V purposes? If so, should netting be needed, Unit 4 should be included in the analysis. If not, I'd appreciate learning why PADEP determined these are separate facilities and not "units under common control".
2. Page 7 of the draft Review Memo, bullet three states that avoided emissions are greater than startup/shutdown emissions. Can you please clarify that in light of the preceding bullet on page 7?
3. Please provide baseline actual emissions for NOx and VOCs that were used to calculate the increases listed on page 8 of your review memo. Am I correct in understanding that the PTE for the Project will be 46.8 for NOx and 9.608 for VOC?
4. A PSD analysis would not be needed in this case for NOx and VOC, as these are subject to an NSR applicability determination. A (1) should be included in the last column on the table on page 10 for NOx, or, even better, the rows for NOx and VOCs should be omitted.
5. Are the "Project Emission Increases" for NOx and VOCs listed on page 10 of the Permit Review Memo not the same as those listed on page 8 because Unit 6 is included in the netting but not the determination of increase? Please explain why these emissions are not the same and note that the same "increase" determined in Step 1 should be used in Step 2, from which contemporaneous increases and decreases are added/subtracted to produce a net emissions increase/decrease.
6. Please provide the details on the contemporaneous increases and decreases

that are summarized on page 10 of the Permit Review Memo.

7. Have you fully evaluated EPA's March 16, 1995, "Potential to Emit for MACT Standards-Guidance on Timing Issues", which is also known as the "Once In Always In" policy, in the context of whether 40 CFR Subpart YYY applies? This policy clarifies that facilities that are major sources of HAPs on the first compliance date of the standard must comply permanently with the MACT standard to ensure that maximum achievable reductions in toxic emissions are achieved and maintained. We can discuss this further after checking the Title V Policy & Guidance Database.

As always, please contact me with any questions or concerns. Thank you for this opportunity to comment. I look forward to your response.

Gerallyn Duke
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